

FREDDIE CASHAW
7316 BRENTWOOD CIRCLE
WACO, TEXAS 76712

Attachment 2 - EEOC Complaint Form

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DIVISION

FILED

APR 13 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY 18W
DEPUTY CLERK

Freddie Cashaw
7316 Brentwood Circle
Woodway, TX 76712
(Name of plaintiff or plaintiffs)

Civil Action Number:

6:22-CV-369

v.
La Salle Corrections Inc.
192 Bastille Lane, Suite # 200
Ruston, La 71270
(Name of defendant or defendants)

(Supplied
by Clerk's Office)

COMPLAINT

1. This action is brought by Freddie Cashaw, Plaintiff,
pursuant to the following selected jurisdiction:

(Please select the applicable jurisdiction)

- ☒ Title VII of the Civil Rights Act of 1964 (42 USC §§ 2000e et seq.) Employment
Discrimination on the basis of race, color, sex (gender, pregnancy and sexual harassment),
religion or national origin.
- ☐ The Age Discrimination in Employment Act (29 USC §§ 621 et seq.) (ADEA).
- ☐ The Americans With Disabilities Act (42 USC §§ 12102 et seq.) (ADA).
- ☐ The Equal Pay Act (29 USC § 206(d)) (EPA).
- ☐ The Rehabilitation Act of 1973 (29 USC § 791 et seq.) (Applicable to federal employees
only).

2. Defendant La Salle Corrections Inc. (Defendant's name) lives
at, or its business is located at 192 Bastille Lane, Suite # 200
(street address), Ruston, La 71270 (city),
(state), La (zip).

- 3a. Plaintiff sought employment from the defendant or was employed by the defendant at La Salle Correctional Inc. (street address), (city), Arrestee (state), TX 76643 (zip). 910 Lynne Road
- 3b. At all relevant times of claim of discrimination, Defendant employed 1,200.00 (#) employees. If defendant is a union, at all relevant times of claim of discrimination, Defendant had _____ (#) members.
4. Defendant discriminated against plaintiff in the manner indicated in paragraph 8 of this complaint on or about Sept. 23 (month) 9 (day) 23 (year). If incidents of discrimination occurred more than one day, please indicate the beginning and ending dates of such acts: Sept 23, 2016
5. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission (E.E.O.C.) charging defendant with the acts of discrimination indicated in paragraph 7 of this complaint on or about _____ (month) Sept. (day) 23, (year) 2016. (Not applicable to federal civil service employees).
- 6a. The E.E.O.C. issued a Notice of Right to Sue which was received by plaintiff on (month) March (day) 28, (year) 2022. (Not applicable to ADEA and EPA claims or federal civil service employees).

VERY IMPORTANT NOTE:

PLEASE ATTACH A COPY OF YOUR NOTICE OF RIGHT TO SUE AND THE ENVELOPE IN WHICH IT WAS RECEIVED TO THIS COMPLAINT.

- 6b. Please indicate below if the E.E.O.C issued a Determination in your case:

☒ Yes
☐ No

VERY IMPORTANT NOTE:

IF YOU CHECKED "YES", PLEASE ATTACH A COPY OF THE E.E.O.C.'S DETERMINATION TO THIS COMPLAINT

7. Because of plaintiff's:

(Please select the applicable allegation(s))

- ☒ Race (If applicable, state race) African American (Black)*
- ☐ Color (If applicable, state color) _____

- ☒ ^m Sex (gender, pregnancy or sexual harassment) (If applicable, state sex and claim)
- ☐ Religion (If applicable, state religion) Baptist
- ☐ National Origin (If applicable, state national origin) _____
- ☐ Age (If applicable, state date of birth) 12-02-1953 (68y)
- ☐ Disability (If applicable, state disability) _____
- ☐ Prior complaint of discrimination or opposition to acts of discrimination.
(Retaliation) (If applicable, explain events of retaliation) _____

The defendant: (please select all that apply)

- ☒ failed to employ plaintiff.
- ☐ terminated plaintiff's employment.
- ☐ failed to promote plaintiff.
- ☐ harassed plaintiff.

☒ other (specify) Plaintiff was unable to communicate by phone. (Captain)
(Request status of my application?)
 H/R I was placed on work status, the Agency then having up the front.

8a. State specifically the circumstances under which defendant, its agent, or employees discriminated against plaintiff PERSONALLY:

VERY IMPORTANT NOTE:

INCLUDE SPECIFIC DATES, SPECIFIC EVENTS,
AND ANY SPECIFIC COMMENTS MADE BY
DEFENDANT PERTAINING TO THE
DISCRIMINATION CLAIM ALLEGED ABOVE.

Mrs. Sharon Russell H/R Director threw my
application in a small trash can.

- 8b. List any witnesses who would testify for plaintiff to support plaintiff's allegations and the substance of their testimony:

Elgin Asbery - 848 Mohr St. 76642
Lorice M. Asbery - 613 Lenox St. Waco, TX 76704
Shondricka A. Asbery - 613 Lenox St. Waco, TX 76704

- 8c. List any documentation that would support plaintiff's allegations and explain what the documents will prove:

Sworn Affidavits from witnesses who
were on duty, and saw/witness H/R Director Mrs. Sharon Russell
throw away my job application in a small trash can,
located at House Show Station at Detention Center, approx.
Sept 23, 2016.

U.S. Department of Justice
Federal Bureau of Investigation

Law Enforcement Officer (Retired) Jan 31, 2006

30 yrs. Corrections Specialist, Federal (U.S. Dept of Justice) and
State Correctional systems.

9. The above acts or omissions set forth in paragraphs 7 and 8 are:

- ☒ still being committed by defendant.
☐ no longer being committed by defendant.

10. Plaintiff should attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission. This charge is submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

- ☐ Defendant be directed to employ plaintiff.
☐ Defendant be directed to re-employ plaintiff.
☐ Defendant be directed to promote plaintiff.

☒ Defendant be directed to pay Compensatory damages amount of loss
and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

of income, resulting from defendant's misconduct.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Date Freddie Cashaw

Signature of Plaintiff

7316 Brentwood Circle

Address of Plaintiff

Woodway TX

City

State

76712

Zip Code

Telephone Number(s)

254-339-0014 (cell)
254-224-6689 (H)



Attachment 3 - EEOC Checklist

EEOC SUIT CHECKLIST

The following items are essential for processing your case. Please use this checklist to make sure you have included all necessary items which are applicable to your claim.

- ☒ Did you fill out the complaint form **legibly and completely**?
- ☒ Did you attach one copy of the Right to Sue Letter from the E.E.O.C. and the envelope in which it was received to your complaint? (Not applicable to ADEA and EPA claims or federal civil service employees).
- ☒ If a determination was made by the E.E.O.C. in your case, did you attach one copy of that determination to your complaint?
- ☐ Did you attempt to contact any attorneys? Did you utilize the reference lists provided at the end of the complaint package in your attempt to retain an attorney?
- ☐ If you are not being represented by an attorney and want to be represented by a court appointed attorney, did you complete the Request for Appointment of Counsel form?
- ☐ Did you complete the Application to Proceed In Forma Pauperis Form? (Applicable to those who wish to have appointed counsel and/or those who wish to represent themselves but cannot afford filing and service of process fees).
- ☒ Did you complete the USM-285 and summons forms for each defendant? (These forms are for service of process).
- ☒ Did you file with the court the original and one copy of the above forms which are applicable to your case?
- ☒ Did you provide corresponding additional copies of your complaint and right to sue letter for each of the defendants you are suing? (Copies are needed for service of process).
- ☒ Did you pay the \$350.00 filing fee? (Not applicable to those applying to proceed in forma pauperis). **Note:** The court may either grant or deny the Application to Proceed In Forma Pauperis. If the court denies the application, you must pay the filing fee and the service of process costs or your complaint will not proceed through the court.

It is very important that you print legibly throughout these forms so that the judge reviewing your case can read your claim and make proper decisions concerning your claim. If writing space is insufficient for complete answers on any question, you may attach additional pages.